

REMARKS

Claims 1-23 are pending in the application.

Claims 1-23 have been rejected.

Claims 1, 3-8, 10, 11, 13-15, 17, 18, 20, 22, and 23 have been amended. No new matter has been added. Support for these amendments can be found, at least, in ¶¶ [0019]-[0040] and Figures 1-3 of the originally-filed Application.

Objections to Specification

The specification stands objected to as purportedly failing to provide proper antecedent basis for the claimed subject matter reciting a source format. *See* Office Action, p. 2. Applicants respectfully submit that no correction of the specification is required to address this objection, given that the originally-filed Application provides antecedent basis for a source format, particularly in ¶¶ [0031], [0035], [0036], and Figures 2 and 3 of the originally-filed Application.

For example, ¶ [0031] provides for an act of transforming information received from a business system to a format used by a data model, and vice versa. *See* Application, ¶ [0031]. This section of the Application provides for two types of format, one used by the business system (i.e., the source) and one used by a data model. In addition, ¶¶ [0035] & [0036] provide that a request to send opportunity data is received from a source, and this opportunity data is then transformed into a common format. Hence, the information received from a source is in a format recognized by that source (i.e., a source format) and subsequently transformed into a common format.

Therefore, Applicants respectfully submit that the originally-filed Application provides antecedent basis for a source format and thus no correction to the specification is needed.

Rejection of Claims under 35 U.S.C. §112

Claims 1-23 stand rejected under 35 U.S.C. § 112, first paragraph, as purportedly being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. *See* Office Action, p. 2. Applicants respectfully traverse this rejection.

In particular, the Office Action asserts that the use of the term “source format” in Claims 1-23 is somehow unclear, and that support for the term cannot be found in the originally-filed Application. Applicants respectfully reiterate that the above remarks made in this regard clearly demonstrate that the originally-filed Application does in fact provide support for the claimed source format. Support for the claimed source format can be found, at least in ¶¶ [0031], [0035], [0036], and Figures 2 and 3 of the originally-filed Application. Hence, Applicants respectfully request the reconsideration and withdrawal of the rejection to these claims.

Rejection of Claims under 35 U.S.C. § 102(e)

Claims 1-6, 8-13 and 15-23 stand rejected under 35 U.S.C. § 102(e) as being anticipated by International Publication No. WO 01/43031 listing Chin as the inventor (“Chin”). Applicants respectfully traverse this rejection.

Claim 1, as amended, is representative of independent Claims 11, 18, and 22 and recites the following limitations:

- defining an opportunity data model, wherein
 - the defining is performed at an integration server,
 - the opportunity data model represents an opportunity as data elements,
 - the opportunity data model represents a set of relationships between the opportunity and a plurality of entities related to the opportunity as attributes of the opportunity; and
- transforming data received from a source application, wherein
 - the transforming is performed at the integration server,
 - the data received from the source application is in a source format,
 - the transforming transforms the data received from the source format into the common format, and
 - the common format is a format recognized by the integration server,
 - the opportunity data model provides the common format,
 - the common format facilitates transforming data stored in the common format to data stored in another format,
 - the data stored in the common format is stored at the integration server, and
 - the data stored in the another format is stored at a system of one of the entities.

The Office Action relies on Chin to disclose the limitations of Claim 1. *See* Office Action, pp. 3-4. Applicants respectfully submit that the cited sections of Chin fail to show, teach, or even suggest the limitations of Claim 1, as amended.

The cited sections of Chin provide for a referral method in which a sponsor can contact a referral system to request referrals for an opportunity or transaction and recipients can provide such referrals to fulfill the opportunity or transaction. *See* Chin, p. 7, last paragraph. The Office Action equates Chin's act of having a sponsor define an available opportunity or transaction with the claimed act of defining an opportunity class representing an opportunity. *See* Office Action, p. 3. However, the cited sections of

Chin fail to show, teach, or even suggest defining an opportunity data model, in which the opportunity data model represents an opportunity as data elements.

Instead, the cited sections of Chin provide for a sponsor contacting a referral system and placing a request for referrals. *See* Chin, pp. 7-8. Such communication between a sponsor and the referral system occurs via the Internet, particularly via email. *Id.* But, communications between a sponsor and a referral system via email does not teach or suggest defining an opportunity data model that is used to represent an opportunity. At best, Chin provides that an opportunity or transaction is described by a sponsor as text within an email, but email text is not comparable to an opportunity data model.

In addition, the cited sections of Chin also cannot be characterized as disclosing an opportunity data model that represents an opportunity as data elements. This is at least because email text used to describe an opportunity or transaction in no way teaches or suggests using data elements within a data model to represent an opportunity. Therefore, the cited sections of Chin fail to show, teach, or even suggest defining an opportunity data model, in which the opportunity data model represents an opportunity as data elements.

Furthermore, the cited sections of Chin also fail to show, teach, or even suggest an opportunity data model that represents a set of relationships between the opportunity and a plurality of entities related to the opportunity, as attributes of the opportunity. As discussed above, the cited sections of Chin fail to make use of an opportunity data model for representing an opportunity, in the first place. Using the same rationale, Applicants respectfully submit that the cited sections of Chin fail to show, teach, or even suggest an

opportunity data model that represents a set of relationships between an opportunity and a plurality of entities related to the opportunity, as attributes of an opportunity.

Moreover, the cited sections of Chin fail to show, teach, or even suggest that an opportunity data model provides a common format and that the common format facilitates transforming data stored in the common format to data stored in another format. The cited sections of Chin provide that a referral system operates as a medium between a sponsor and a plurality of recipients. *See* Chin, p. 7, last paragraph. However, a referral system acting as a medium between a sponsor and recipients does not teach or suggest the use of an opportunity data model to provide a common format, where the common format facilitates transforming data stored in the common format to data stored in another format. The cited sections of Chin provide for email communications between a sponsor, referral system, and recipients. *See* Chin, p. 7, last paragraph. Even if Chin's use of email could be equated to a common format (a point Applicants do not concede), the cited sections of Chin do not teach or suggest the use of an opportunity data model as a common format, where the common format facilitates transforming data stored in the common format to data stored in another format. This is because the cited sections of Chin fail to teach or suggest the use of any opportunity data models. And, email text is not comparable to an opportunity data model. Therefore, the cited sections of Chin fail to show, teach, or even suggest that an opportunity data model provides a common format and that the common format facilitates transforming data stored in the common format to data stored in another format.

For at least these reasons, Applicants respectfully submit that Chin fails to show, teach, or even suggest all the limitations of independent Claims 1, 11, 18, and 22.

Therefore, Applicants respectfully request the reconsideration and withdrawal of the rejection to Claim 1, 11, 18, and 22, and all claims depending therefrom.

Claim 6, as amended, recites the following limitations:

transforming the data in the common format into a target format of a target application, wherein
the target format is the another format, and
the target format represents the data as another opportunity data model;
and
sending the data in the target format to the target application.

The Office Action relies on Chin to disclose the limitations of Claim 6. *See* Office Action, p. 5. Applicants respectfully submit that Chin fails to show, teach, or even suggest the limitations of Claim 6, as amended.

The Office Action asserts that the limitations of Claim 6 are inherent in any Internet communication including that of Chin. *See* Office Action, p. 5. However, the cited sections of Chin fail to show, teach, or even suggest that a target format represents data as another opportunity data model. As discussed above with regards to Claim 1, the cited sections of Chin fail to show, teach, or even suggest defining or using or opportunity data models, whether at an integration server, on a system of an entity, or at a target application. Therefore, the cited sections of Chin cannot be said to teach or suggest that a target format represents data as another opportunity data model.

For at least these reasons, Applicants respectfully submit that Chin fails to show, teach, or even suggest all the limitations of Claim 6. Therefore, Applicants respectfully request the reconsideration and withdrawal of the rejection to Claim 6.

Claim 8, as amended, is representative of independent Claims 15, 20, and 23 and recites the following limitations:

receiving opportunity data from a source application, wherein
the opportunity data received from the source application is in a source
format,
the opportunity data represents an opportunity, and
the receiving is performed at an integration server; and
transforming the opportunity data received from the source format into a common
format defined by an opportunity data model, wherein
the opportunity data model represents the opportunity as data elements,
the opportunity data model represents a set of relationships between the
opportunity and a plurality of entities related to the opportunity as
attributes of the opportunity,
the common format is a format recognized by the integration server,
the transforming is performed at the integration server,
the opportunity data model provides the common format,
the common format facilitates transforming data stored in the common
format to data stored in another format,
the data stored in the common format is stored at the integration server,
and
the data stored in the another format is stored at a system of one of the
entities.

The Office Action relies on Chin to disclose the limitations of Claim 8. *See* Office Action, pp. 5-6. Applicants respectfully submit that Chin fails to show, teach, or even suggest the limitations of Claim 8, as amended.

Applicants respectfully submit that Claim 8 includes limitations that are similar to those of Claim 1. For example, Claim 8 recites transforming opportunity data received from a source format into a common format defined by an opportunity data model, the opportunity data model representing an opportunity as data elements, the opportunity data model representing a set of relationships between the opportunity and a plurality of entities related to the opportunity as attributes of the opportunity, the opportunity data model providing a common format, and the common format facilitating transformation of

data stored in the common format to data stored in another format. As such, Applicants respectfully reiterate the above made remarks with regards to Claim 1 that the cited sections of Chin fail to show, teach, or even suggest all the limitations of Claim 8.

For at least these reasons, Applicants respectfully submit that Chin fails to show, teach, or even suggest all the limitations of independent Claims 8, 15, 20, and 23. Therefore, Applicants respectfully request the reconsideration and withdrawal of the rejection to Claim 1, 15, 20, and 23, and all claims depending therefrom.

Rejection of Claims under 35 U.S.C. § 103(a)

Claims 7 and 14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Chin. Applicants respectfully traverse this rejection.

Claim 7, as amended, is representative of Claim 14 and recites the following limitations:

a definition of the opportunity data model is represented as an XML schema

The Office Action relies on Chin to disclose the limitations of Claim 7. *See* Office Action, p. 11. Applicants respectfully submit that Chin fails to show, teach, or even suggest the limitations of Claim 7, as amended.

Claim 7 provides that an opportunity data model is represented as an XML schema. The Office Action takes Official Notice that XML schema is well known in data structures and has a primary purpose to help information systems share structured data, particularly via the Internet. *See* Office Action, p. 11.

As an initial matter, Applicants respectfully request that the Examiner provide support for the statements asserted under Official Notice, either by providing a reference or an affidavit from the Examiner.

Furthermore, Applicants respectfully submit that the use of XML to represent opportunity data models, as in the claimed invention, would not have been obvious to one of ordinary skill in the art at the time of the invention. Even assuming that XML could be successfully characterized as teaching such concepts (a point Applicants do not concede), a general sharing of data structures does not teach or suggest the specific use of opportunity data models to represent opportunity data at an integration server. Claim 7, as an extension of Claim 1, provides for a common format, by using opportunity data models represented as XML schema, to map and exchange data between an integration server and various systems of an entity. Thus, it is an integration server utilizing a common format (i.e., the opportunity data models) that removes any need for unnecessary conversions when multiple systems of an entity communicate opportunity data to each other via the integration server. Such an advantage would not have been obvious from the general teachings of XML schema. Hence, the cited sections of Chin in combination with general XML knowledge fail to show, teach, or even suggest the limitations of Claim 7.

For at least these reasons, Applicants respectfully submit that Chin fails to show, teach, or even suggest all the limitations of Claims 7 and 14. Therefore, Applicants respectfully request the reconsideration and withdrawal of the rejection to Claims 7 and 14.

CONCLUSION

In view of the amendments and remarks set forth herein, the application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at (512) 439-5094.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicants hereby petition for such extensions. Applicants also hereby authorize that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to Deposit Account 502306.

Respectfully submitted,

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